

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Atah H. Akakpo-Martin

**Debtor 1**

Suson E. Akakpo-Martin

**Debtor 2**

First National Bank of Pennsylvania

**Movant(s)**

v.

Atah H. Akakpo-Martin

Suson E. Akakpo-Martin

**Respondent(s)**

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 1:21-BK-01810-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 78

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Atah H. Akakpo-Martin and Suson E. Akakpo-Martin, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 1; therefore, it is denied.
2. Upon information and belief, the averment as stated in Paragraph 2 is admitted.
3. Upon information and belief, the averments as stated in Paragraph 3 are admitted.
4. Admitted.
5. Admitted.
6. Upon information and belief, the averment as stated in Paragraph 6 is admitted.
7. Admitted.
8. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 8; therefore, it is denied.
9. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 9; therefore, it is denied.
10. Admitted.

11. Admitted.

12. Admitted.

13. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 13; therefore, it is denied.

14. Paragraph 14 contains a conclusion of law to which no response is required.

15. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 15; therefore, it is denied.

16. Paragraph 16 contains a conclusion of law to which no response is required.

17. Admitted.

18. Paragraph 18 contains a conclusion of law to which no response is required.

19. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 19; therefore, it is denied.

20. Upon information and belief, the averment as stated in Paragraph 20 is admitted.

21. Paragraph 21 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: January 22, 2025

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Wednesday, January 22, 2025, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

David Raphael, Esquire  
First National Bank of Pennsylvania  
626 Washington Place  
Pittsburgh, PA 15219  
*Counsel for Movant(s)*

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Sylvia H. Rambo United States Courthouse  
1501 North Sixth Street, Floor 3  
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire